

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

SEANA GOODSON, <u>et al.</u> ,	)	Case No. CV 14-0140 FMO (SSx)
	)	
Plaintiffs	)	
	)	
v.	)	<b>ORDER Re: MOTIONS FOR CLASS</b>
	)	<b>CERTIFICATION</b>
MEDICREDIT, INC.	)	
	)	
Defendant.	)	
	)	

A deadline for motion for class certification has been set in the above-captioned case. Any motion(s) for class certification **shall** comply with all Federal Rules of Civil Procedure and Local Rules, as well as this Order. Please be advised that this Order contains requirements more specific than the Local Rules and Federal Rules of Civil Procedure.

1. Local Rule 7-3 Conference: The parties shall meet and confer, in person, to narrow and crystallize the issues to be argued in any motion for class certification. The meet and confer shall be transcribed by a court reporter and the transcript of the motion shall be filed with the motion. The parties shall discuss *each issue* to be raised in the motion(s), as well as the law and evidence relevant to that issue, so that the parties' briefing may reflect that they are fully cognizant of the other side's position(s). If the briefing reveals that the parties are not on the same page with respect to the issues and position(s) presented, the motion(s) shall be stricken.

2. Timing: The motion(s) shall be properly noticed under the Local Rules, see Local Rule 6-1, and filed by the deadline set forth in the Scheduling Order in compliance with Local Rule 7-3.

1           3. Joint Brief: The parties shall work cooperatively to create a single, *fully integrated* joint  
2 brief covering each party's position, in which each issue (or sub-issue) raised by a party is  
3 immediately followed by the opposing party's/parties' response. The joint brief shall set out each  
4 issue (or sub-issue), including legal argument and direct citation to the evidence, followed seriatim  
5 by the response with respect to that issue (or sub-issue), including legal argument and direct  
6 citation to evidence.

7           4. Citation to Evidence: All citation to evidence in the joint brief shall be directly to the  
8 exhibit and page number(s) of the evidentiary appendix, (see infra at ¶ 7), or page and line  
9 number(s) of a deposition. Parenthetical explanations are encouraged. The parties shall cite to  
10 relevant evidence to support factual assertions throughout the joint brief. Failure to cite to  
11 evidence in support of a factual assertion shall be deemed the party's admission that the party  
12 lacks evidence of that fact. Evidence not cited by a party in the joint brief shall be deemed  
13 admitted to be irrelevant.

14           5. Unnecessary Sections: The parties need not include a "procedural history" section,  
15 since the court would be familiar with the procedural history. The court is also familiar with the  
16 general standard for class certification, so that need not be argued. However, if a party believes  
17 a specialized standard is applicable, the party may brief such a standard. If preliminary issues –  
18 such as burden of proof, standard of review, or choice of law – are in dispute, the parties shall  
19 brief such issues in accordance with ¶ 3, supra.

20           6. Page Limitation: Each separately-represented party shall be limited to twenty-five (25)  
21 pages, exclusive of tables of contents and authorities. Repetition shall be avoided and, as always,  
22 brevity is preferred. Leave for additional space will be given only in extraordinary cases. The  
23 excessive use of footnotes in an attempt to avoid the page limitation shall not be tolerated. All  
24 substantive material, other than brief argument on tangential issues, shall be in the body of the  
25 brief.

